

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JASON COLBY CALLICOTTE, et al
Plaintiff,

V.

HARRIS COUNTY,
Defendant.

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CIVIL ACTION NO. 4:20-CV-01369

JURY DEMAND

DECLARATION OF HARRIS COUNTY

WHEREAS, Harris County, the State of Texas, and the United States have experienced the ongoing COVID-19 pandemic since March, 2020;

WHEREAS, Harris County takes its responsibility to maintain the welfare and safety of jail inmates seriously;

WHEREAS, Harris County is in compliance with all federal, state, and local guidance with regards to its response to the pandemic and is in contact with related agencies on a daily or weekly basis;

WHEREAS, Harris County has taken extraordinary measures since the outset of the pandemic to prevent the spread of COVID-19 in its jails including, but not limited to, assisting stakeholders in reducing the total jail population, the restructuring of inmate intake through cohorting and quarantining, restrictions on visitors and non-pod activities, and by increasing the frequency and quality of sanitation measures as well as supplies provided directly to the inmates;

WHEREAS, Harris County will provide throughout the pandemic educational materials for the inmates related to COVID-19 prevention including instructional videos transmitted

to the housing pods' television monitors, posters and signage in the hallways, and the grievance procedure;

WHEREAS, Harris County will provide free of charge throughout the pandemic a reasonably sufficient supply of soap, capable of providing protection from COVID-19, to all inmates with more available as reasonably needed from the detention officer on duty or upon request submitted through the inmate kiosk located inside the housing pod.

WHEREAS, Harris County will provide, free of charge throughout the pandemic a reasonably sufficient supply of hand and body drying materials, capable of providing protection from COVID-19, with replacements available as reasonably needed from the detention officer on duty or upon request submitted through the inmate kiosk located inside the housing pod;

WHEREAS, Harris County will provide free of charge throughout the pandemic cleaning supplies, capable of providing protection from COVID-19, to all inmates to clean their pods as reasonably needed with more supplies available as reasonably needed from the detention officer on duty or upon request submitted through the inmate kiosk located inside the housing pod. Said supplies are not transferred between housing pods;

WHEREAS, Harris County will provide free of charge throughout the pandemic masks, capable of providing protection from COVID-19, to all inmates with a replacement available as reasonably needed from the detention officer on duty or upon request submitted through the inmate kiosk located inside the housing pod;

WHEREAS, Harris County will provide throughout the pandemic education to its jail employees and all detainees on COVID-19 prevention procedures;

WHEREAS, Harris County will provide throughout the pandemic laundry services twice a week but certain items may be replaced as reasonably needed from the detention officer on duty or upon request submitted through the inmate kiosk located inside the housing pod;

WHEREAS, Harris County will preserve all inmate grievances related to COVID-19 in accordance with state guidelines and ensure that COVID-19 related grievances are directed to the proper unit for review; for example, medical concerns will be forwarded to the medical unit and supply concerns will be forwarded to the housing unit;

WHEREAS, Harris County will add a COVID-19 folder to the inmate kiosk located inside the housing pod prior to November 30, 2020, and said folder will provide the following information:

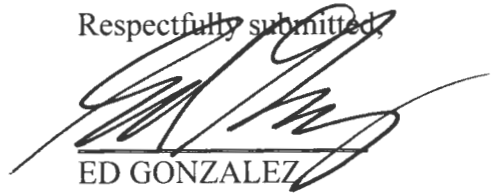
- (1) The contents of this Declaration;
- (2) COVID-19 related educational materials
- (3) The channel, date and time that COVID-19 prevention and instructional videos will air on housing pod's television monitors;
- (4) The ability to submit an electronic request for additional soap, hand and body drying materials, cleaning supplies, masks and laundry services, such submission shall be preserved by Harris County;

(5) A copy of the inmate handbook which includes a detailed explanation regarding the procedure for an inmate follow to exhaust all administrative remedies.

In addition to the foregoing, Harris County will continue to monitor and implement the Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities in the future and throughout the pandemic.

Consistent with the foregoing, Harris County remains committed to the health and safety of all stakeholders and residents of its jail facilities.

Respectfully submitted,



ED GONZALEZ
Sheriff of Harris County, Texas